

FIRST REGIONAL LIBRARY HEADQUARTERS LIBRARY

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"Serving DeSoto, Lafayette, Panola, Tate and Tunica Counties"

October 13, 1997

Irene Flannery
Universal Service Branch
Federal Communications Commission
FAX: 202-418-7361

Dear MS Flannery:

I wish to register my concern about the proposed application forms for universal service discounts (Forms 470 Y 471). I am the director of a five-county regional public library system with twelve branch libraries in northwest Mississippi. We have just recently been connected to the Internet through the efforts of our State Library Commission. Although we are one of the largest public library systems in the state, this help from our state agency was and is vital to our becoming an "Internet Ready Library".

Our state library commission has been very active this past year in negotiating with local telephone service providers for telecommunications rates for frame-relay service throughout the entire state. I can safely say that, without their authority to act for the entire state, many public and school libraries in the state would not have access to the Internet and the accompanying benefits that we enjoy today from that access.

The ability to secure and use "area wide" discount rates statewide, or in our case "region wide", is vital if we are to be able to insure that smaller libraries within our system enjoy the benefits of belonging to a larger organization. I

can see no useful purpose for forcing every library unit and/or school to apply for individualized discount rates, especially when these libraries and schools are already part of an existing library system or school district.

I urge the FCC to reconsider these proposed forms and change them in a way that will support aggregation, which has proven to be a most effective way to lower costs for libraries and schools. Thank you for your consideration of this request.

Sincerely,

Jim Anderson
Director

THE STATE



OF WYOMING

J. L. ERINGER
GOVERNORDONALD STON
DIRECTOR

Department of Administration and Information State Library

FAX MEMORANDUM

TO: Mark Nadel, FCC USF Branch, fax #: 202/418-7361

FROM: Corky Walters, Wyoming State Library

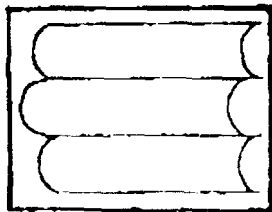
DATE: October 13, 1997

RE: Application forms for USF discounts to rural public libraries

Public libraries in Wyoming strongly oppose changes in USF application forms to inhibit aggregation of services to calculate discounts. As the most rural state in the country, Wyoming has taken advantage of cooperative efforts to achieve telecommunications connectivity. If libraries here are forced to make application and apply discounts separately, we expect that very few could follow through with the burden of the entire process to realize the intended discounts. Our cooperative projects are very much structured to make aggregation of services and discounts the most effective way to have Wyoming libraries realize telecommunications discounts as intended by the law.

Corky Walters, Library Automated Systems and Services Office, Wyoming State Library

cc: Aleck Johnson, American Library Association, fax 202/628-8424



Western Plains Library System

SERVING:
CUSTER, DEWEY, ROGER MILLS, WASHITA
COUNTIES

SERVICE CENTER:
605 AVANT CLINTON, OKLA. 73601
P.O. BOX 1077 TELE. (405) 323 0974

October 13, 1997

Mr. Mark Nadel
Federal Communications Commission
Washington, D.C.

Dear Mr. Nadel:

Today I received a "draft" copy of a form titled "Schools and Libraries Universal Service Program, Description of Services requested and Certification. It was interesting to note the remark at the top that "estimated average burden hours per request" is estimated to be 3 hours.

Do you folks know what it is like to serve a 4200 square mile area of Western Oklahoma with public library service through 7 small rural libraries and a bookmobile? Do you realize that we run on fumes most of the time, have only a minimal number of employees because we have so little money, and yet we are loaning an average of about 6 books per person in our area a year. We also have an automated card catalog and a direct phone line connect between our AS400 and our libraries. We also have Free Public Internet Access at four of our libraries, but not at the others because of the cost of the equipment and phone services.

We have been viewing the Universal Service Act as a marvelous help which will allow us to add more services, and improve what we already have because we can afford to get some 56K lines and so forth.

Now, I see the paperwork, which I had already begun to suspect from what I have read and the two meetings I have attended on this program.

The paper work load is daunting enough, but you are adding the other problems of so many mandates about providers, etc., and bidding, and well, the list grows and grows. We also think after a reading of the "draft proposal", that we really need an "Interpreter" to tell what you want.

The only reason we will do all of this is because we want to give our

library users the best service we can and we need the advantages the Universal Services Act was intended to provide. We will do all of this with the library staff we have, because we cannot afford to hire more staff with more expertise, and we will do all of this although it impedes and slows our delivery of basic library services, because your required paperwork takes us away from our other duties. If we hired the help we need to prepare the paperwork, it would take away any cost savings which the Universal Services Act may give us. Frankly, I am beginning to question if it is a "good deal".

As usual, when the governmental bureaucracy gets involved, the purpose of the entire Universal Services Act is lost-----to provide more informational services to our public schools and public libraries. I have often thought that the end results of laws are a far cry from what was intended when the laws were passed by the lawmakers---because the government workers get involved and with rules and regulations change and impede the real intent.

The end result of the proposed FCC Rules for the entities which want to claim reduced telecommunications rates under the Universal Services Act is to make it more difficult for small rural public schools and libraries---we don't have the money and the staff to be burdened any further with all of these pieces of paper. I think you would find our needs are fairly simple, but not when we have to fill out all of the forms you are proposing to require and when we have to leap the barricades you are erecting to make it possible for us to claim the benefits offered by the Universal Service Plan.

It is all so depressing---when we have to deal with government at any level-----state or federal. How am I, a small public library director, going to fight the FCC and the other Government agencies involved in all of this???? You folks must take courses in "Making little stuff difficult, 101".

Please stop loading us down with "paperwork". We are busy trying to give folks public library service. Please help us for a change, instead of just make our lives more difficult.

Sincerely,

Dee Ann Ray, District Librarian



Rebecca McDowell Cook
Secretary of State

Office of Secretary of State
State of Missouri
Jefferson City, MO 65101

State Information Center
Missouri State Library

MEMORANDUM

TO: Irene Flannery, Universal Service Branch at the FCC
Mark Nadel, Universal Service Branch at the FCC
FROM: Sara Parker, Missouri State Librarian *sp*
RE: Forms 470 and 471 Proposed Changes
DATE: October 14, 1997

Thank you for the opportunity to comment on proposed changes to Forms 470 and 471.

The proposed changes work serious hardships for schools and libraries, especially those participating in consortia. The levels of complexity required will be a disincentive to libraries and consortia, especially those who are poor or rural.

Library consortia throughout the United States have historical experience in cost allocation. In many cases cost allocation is made to subsidize those poor and rural libraries who are less likely to have the financial resources to participate.

The wording changes that require "services provided to more than one entity" and "services provided to the individual school or library" to be broken out for each separate service for each separate entity will be extremely difficult. This would undermine the existing cost mechanisms. It especially would work a hardship on the Missouri Research and Education Network (MOREnet), which receives a state appropriation to connect schools and libraries throughout the state to the Internet.

Public libraries in Missouri are coming together into consortia to share common library systems. The changes proposed in aggregation will make it more difficult for these consortia to order the telecommunication services needed for operations.

Please reject this increased burden of allocation and adopt Forms 470 and 471 in their original form.

Thank you.

SP/bw

Missouri State Library

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TOTAL P.02